

Before the Federal Communications
Commission

IN RE

TRANSITION FROM TTY TO REAL-TIME TEXT TECHNOLOGY
&
PETITION FOR RULEMAKING
TO UPDATE THE COMMISSION'S RULES FOR ACCESS
TO SUPPORT THE TRANSITION
FROM TTY TO REAL-TIME TEXT TECHNOLOGY,
AND PETITION FOR WAIVER
OF RULES REQUIRING SUPPORT OF TTY TECHNOLOGY

ON NOTICE OF PROPOSED RULEMAKING

II

COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION

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CG Docket No 16-145 – GN Docket No 15-178

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**COMMENTS OF THE
NATIONAL EMERGENCY NUMBER ASSOCIATION**

NENA: The 9-1-1 Association respectfully submits the following comments in response to the *Further Notice of Proposed Rulemaking* adopted by the Commission on December 15th, 2016, in the above-captioned proceeding.

COMMENTS

**I. A tentative 2021 sunset date for TTY
backward-compatibility is appropriate.**

As with any major technological transition that requires action on the part of consumers, major industry, and the public sector, the Commission must carefully weigh the

competing needs and interests of varying stakeholder groups. From the perspective of Public Safety Answering Points (PSAPs), these needs and interests are three-fold: First, PSAPs recognize the strong imperative they have to serve all consumers equally, regardless of how consumers use – or must use – technology. Second, PSAPs likewise recognize that they must transition to IP-based technologies like RTT in parallel with the commercial networks that serve consumers *and* the future FirstNet that will serve field responders. Third, however, PSAPs must navigate this transition with often tenuous control over the availability of technology, training, policy, and funding within the local governments they predominantly serve.

Last year, NENA joined with our colleagues from the National Association of State 9-1-1 Administrators and the Industry Council for Emergency Response Technologies to form the NG9-1-1 NOW Coalition. As part of that group, we have set a goal of seeing NG9-1-1 service available nation-wide by the end of the year 2020. Though ambitious, we believe that setting and pursuing this goal is important to the future safety of the public our members serve. NENA therefore generally supports the establishment of a 2021 sunset date for the TTY to RTT backward compatibility mandate. We caution, however, that the Commission should carefully track data trends among consumers, access network providers, originating service providers (such as over-the-top RTT services), and PSAPs. If it appears, closer to the tentative sunset date, that any one of these important constituencies has not yet adequately transitioned to technologies and business practices that natively support RTT, the Commission should be prepared to postpone the sunset for a limited time.

NENA is conscious that this approach may face criticism from some in industry who will think it too uncertain for future investments, and from some in public safety who will think it too aggressive for financially- and politically-constrained PSAPs. However,

we believe that setting a tentative date-certain, and tracking adoption data, will provide an appropriate mix of transition incentives and regulatory flexibility to service providers and local governments alike, and urge the Commission to adopt such an approach.

NENA notes separately the importance of one particular data element that will be crucial to understanding the adequacy of transition efforts related to RTT: The availability of NG9-1-1-compatible location determination and routing mechanisms. In order for PSAPs to access accurate caller location, carriers, both wireline and wireless, must implement standards-compliant Location Information Servers, and NG9-1-1 system service providers must implement Emergency Service Routing Proxies. Without these critical elements, the innovative, open, and competitive RTT space envisioned by the Commission and by many commenters cannot come to fruition in a manner that supports ubiquitous NG9-1-1 service availability. Consequently, NENA recommends that the Commission carefully track the status of such deployments, as this data will prove invaluable in determining *both* service provider and PSAP readiness for the TTY sunset.

II. The Commission should require support for “block-mode” RTT.

NENA reiterates our support, expressed in our original comments for a block-mode RTT support requirement. As the FNPRM notes, support for this function is important, as it allows PSAPs to transmit longer, more complex, and multi-step instructions to callers, without fearing that a caller will misconstrue those instructions while they are still incomplete. Over the past 30 years, PSAPs have increasingly implemented protocol-based call-taking and dispatching functions. Protocols specify the wording, order, and branching of a call-taker’s interrogation of a caller, in order to surface the most important information as quickly as possible. Additionally, protocols enable telecommunicators to provide pre-arrival instructions to

callers, such as leading them through CPR. The ability to push such instructions directly from software in block-mode represents both an important means of avoiding caller confusion, and a means of improving call-handling speed. Consequently, NENA strongly urges the Commission to require support for block-mode text.

CONCLUSION

The Commission should set a tentative sunset date for TTY backward compatibility of year-end 2021, but carefully track adoption data to ensure the final sunset does not negatively impact consumer safety or PSAP operations. The Commission should also require the availability of block-mode RTT from devices and services that are required to support 9-1-1 calling.

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